



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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November 22, 2010

Ms. Linda Blount
JSF East Coast Basing Project Manager
Naval Facilities Engineering Command, Mid-Atlantic
P.O. Box 56488
Jacksonville, Florida 32241-6488

SUBJECT: Final Environmental Impact Statement (FEIS) for the U.S. Marine Corps (USMC) Joint Strike Fighter (JSF) F-35B East Coast Basing at Marine Corps Air Station Beaufort, South Carolina, and Marine Corps Air Station Cherry Point, North Carolina; CEQ Number 20100418. ERP Number USN-E11073-00

Dear Ms. Blount:

Consistent with the U.S. Environmental Protection Agency's (EPA) Clean Air Act (CAA) § 309 and National Environmental Policy Act (NEPA) § 102 (2)(C) responsibilities, EPA has reviewed this FEIS. Consistent with our rating of the draft EIS, we continue to have environmental concerns regarding the proposed action's potential for impacts to the environment we encourage be avoided/minimized.

Background

The proposed action involves basing and operating 13 F-35B Lightning II JSF-squadrons at two southeast Atlantic coastal installations: Marine Corps Air Station (MCAS) Beaufort in Beaufort County, South Carolina (Beaufort, SC) and MCAS Cherry Point in Carteret and Craven Counties, North Carolina (Cherry Point, NC). It proposes to replace 152 existing aircraft (seven F/A-18 operational squadrons, three AV-8B operational squadrons, and one AV-8B training squadron) with 256 F-35B¹ aircraft (11 operational and four Fleet Replacement squadrons). Additionally, the existing authorized military personnel based at both Beaufort, SC, and Cherry Point, NC, would increase by 1,032 military personnel. Additionally, this action includes F-35B and Pilot Training Center (PTC) training and the construction and demolition of facilities and infrastructure associated with basing the F-35B squadrons and the PTC facility.

¹P. 2-16 indicates in one paragraph, "[a] total of 216 F-35B aircraft [16 aircraft per operational squadron (156 aircraft) and 20 per FRS (40 aircraft)] are proposed to replace the 152 authorized Marine Corps F/A-18s and AV-8Bs" while in another paragraph, "... an additional F-35B PTC (with two FRS squadrons [20 aircraft per squadron]) would be established on the East Coast."

The proposed action is to base F-35B operational squadrons where ranges and airspace exist to conduct the necessary training. Both Air Stations are part of the existing Marine Air Ground Task Force command and control structure and provide existing and future airfield, airspace, and infrastructure capacity. Additionally, these Air Stations can integrate the F-35Bs into their operational and training missions because they are aligned to support non-conventional fighter jet missions.

The four alternatives evaluated included: (Alternative 1) basing 3 operational and 2 reserve squadrons at Beaufort, SC, and 8 operational squadrons at Cherry Point, NC, and is the preferred alternative; (Alternative 2) basing 2 reserve squadrons at Beaufort, SC, and eleven operational squadrons at Cherry Point, NC; (Alternative 3) basing 8 operational squadrons at Beaufort, SC, and 3 operational and 2 reserve squadrons at Cherry Point, NC; (Alternative 4) basing eleven operational squadrons at Beaufort, SC, and 2 reserve squadrons at Cherry Point, NC. The no action alternative is the status quo, i.e., prior to basing the F-35B on the East Coast, which is not an option.

EPA's Concerns

Citizen concerns: EPA recommends the USMC consider establishing a noise-effects citizen advisory group for area residents concerned with the noise impacts, particularly on the federally and state-listed endangered species, wood stork. The FEIS notes the potential impact of the proposed F-35B basing upon the wood stork (*Mycteria americana*) is of particular interest to various members of the public.² The public has contacted EPA with their concerns. They have expressed experience with the wood stork's habits that to them differs from the DEIS' portrayal of the wood stork's habits. The recommended advisory group would allow the USMC and the concerned citizens to actively engage to identify and address, as reasonable and practicable, their concerns.

Environmental Justice: According to the FEIS, the Environmental justice (EJ) analysis only considers whether the proposed action and alternatives would disproportionately affect low-income and minority populations when evaluated against the baseline conditions. However, when the existing baseline condition that includes noise impacts from existing training and readiness operations are already high, adverse and predominately borne by EJ populations (relative to the State Thresholds), then those noise impacts can be considered both significant and disproportionate. For example, the DEIS indicates that the percentage of low-income populations currently affected by noise is 32.7 percent (compared to 14.6 percent for the state).

Additional noise increases from the newly proposed action will just further exacerbate the existing conditions and the disproportionate impacts increasing the low-income population by 576. Given the magnitude of the noise impacts and the EJ populations within the affected area, the record of decision should include information on potential noise minimization or mitigation options that can further minimize impacts to EJ populations, it should summarize any outcomes

² P. 4-97.

of its public involvement activities related to EJ communities, including community comments and agency responses and ensure that any Community Advisory Council includes representatives from the EJ community.

Noise: The proposed action's potential noise impacts and significance continues to be a concern. According to the FEIS, the noise data for the F-35B does not yet exist and the F-35A noise data was the only data available to do the proposed action's F-35B noise analysis.³ The FEIS does not discuss any expected noise differential between the F-32A and F-35B. Because the F-35B's short-take off and vertical landing (STOVAL) variant risked missing performance requirements because it was too heavy, the manufacturer made changes to the plane including adding engine thrust.⁴

While some of these changes were made to the other two JSF variants to maintain high levels of commonality, the FEIS does not discuss any differences between the F-35A and the F-35B potentially affecting the FEIS noise study's accuracy in defining noise impacts to the environment, e.g., people and wildlife, for example the F-35B is 6% heavier than the F-35A. Another example, the F-35B's STOVAL feature requires a second engine to lift the plane vertically. The noise associated with this feature has not been discussed. The concern is the proposed action will be louder than documented in the FEIS resulting in significant impacts without appropriate mitigation consistent with NEPA's requirements.

Water conservation: EPA encourages the USMC to incorporate water conservation and efficiency measures in all of its proposed new development and landscape needs. The Southeast USA has a history of cyclical drought periods lasting for several consecutive years. Additionally, the Southeast has a history of population growth particularly in the coastal areas. For example the 2000 US Census indicates the state of Florida had a population larger than the combined populations of the New England states. The combination of increased population and drought periods realizes significant pressure upon the water resources both underground and surface waters. Moreover current demands on ground water supplies are already creating salt-water intrusion problems.

Waste minimization: EPA encourages the USMC recycle as much demolition debris as possible as part of new construction. Additionally to minimize the generation of construction waste and the potential for sediment impacts during demolition activities, EPA recommends building reuse in lieu of demolition.

Wetlands: EPA notes the FEIS indicates the LHD/LHA Training Facility has been relocated to a location where wetlands will no longer be impacted.

3 P. 3-10.

4 Lockheed Martin F-35 Lightning II – http://en.wikipedia.org/wiki/Lockheed_Martin_F-35_Lightning_II.

Thank you for the opportunity to review and provided comments. If you wish to discuss this matter further, please contact Beth Walls (404-562-8309 or walls.beth@epa.gov) of my staff.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mueller', with a stylized flourish at the end.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management